

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL  
LEAGUE PLAYERS' CONCUSSION  
INJURY LITIGATION

No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-  
Form Complaint and:

George W. Adams, et al. v. National  
Football League, et al. (Plaintiffs George  
W. Adams and Michelle L. Adams ONLY)

Court File No. 2:12-cv-00683-AB

**MOTION FOR LEAVE TO**  
**WITHDRAW AS COUNSEL**  
**FOR PLAINTIFFS GEORGE W.**  
**ADAMS AND MICHELLE L ADAMS**

J. Gordon Rudd, Jr., Brian C. Gudmundson, and Michael J. Laird of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of George W. Adams and Michelle L. Adams only in this action, and state as follows:

1. Plaintiffs' counsel filed the action *George W. Adams, et al. v. National Football League, et al.*, No. 12-CV-00683, in the Eastern District of Pennsylvania on February 8, 2012, for the benefit of several retired National Football League players, including George W. Adams and his spouse, Michelle L. Adams.

2. Plaintiffs' counsel filed a short form complaint for George W. Adams and Michelle L. Adams on July 12, 2012.

3. Despite the efforts of the undersigned on Plaintiffs' behalf, the NFL Concussion Settlement Claims Administrator informed Zimmerman Reed LLP that Plaintiffs retained separate counsel to represent them in this case.

4. Specifically, on May 18, 2021, the Claims Administrator issued an NFL Representation Notification ("Notice") to Zimmerman Reed LLP stating that Plaintiffs informed the Claims Administrator that they are represented by a different lawyer, and listing Byron Cuthbert and Associates, LLC as the "New Lawyer Requested by Settlement Class Member" (Exhibit A).

5. The Notice provides "seven days to communicate with the Settlement Class Member and come to a resolution" before the Claims Administrator would "update the Class Member's representation in [its] database to the new lawyer above." Zimmerman Reed LLP attempted to contact Plaintiffs, but they did not respond. More than seven days have passed from the Notice date.

6. Under the circumstances, it is apparent that the undersigned must move the Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully asks this Court for leave to withdraw as counsel for George W. Adams and Michelle L. Adams only in Court File No. 2:12-cv-00683-AB.

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Dated: June 22, 2021

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Brian C. Gudmundson

J. Gordon Rudd, Jr. (#222082)

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